

Re: Draft 1 Eligibility Criteria (Version 2.0)

We have reviewed the purposed changes and would like to make the following comments.

Regards Section 1 Definitions,

Item A – Definition of a Residential Ventilation Fan – a point must be added here or elsewhere in the criteria for Qualifying fans that the product must be HVI certified in accordance to HVI standard 920 – from what I read, it is not mentioned anywhere only that the fans be tested to HVI 915 & HVI 916.

Eliminating fans which incorporate electric resistance heating, heat lamp heating, or lamp sockets capable of accepting incandescent lamps – We support this point.

Regards Section 2 Qualifying Products.

Criteria used to Qualify products must be the maximum air & sound performance achieved when tested & certified in accordance with HVI 920, or Qualifying Product must meet the criteria listed at all Speeds tested and certified in accordance with HVI 920 – There are many multi speed products currently certified by HVI whose ratings may meet at one speed but not at the other.

Regards Section 3 ENERGY STAR Specification Requirements

Changes to Table 1 – removing of the required Sone levels – As has been mentioned, sound levels are an essential part of the marketing & selling of these products – In order to assure proper ventilation rates are maintained the newer building codes are emphasizing the Sone levels as much as the CFM rates if not more – For this reason I would not remove the Sone levels from Table 1 and would ask that they remain an integral part of the Specification requirements.

Regards Section 3 Item B Quality Assurance Requirements.

Item 2. Fan sound levels, We would have to disagree with the increase in the allowable Sone level from 1.5 to 3.0 in fans above 76 CFM for the same reason as mentioned above. Sone levels are an integral feature for these fans and affect how and why they are used – and as such, raising the Sone level for ENERGY STAR fans will only serve to act against where the newer building codes are heading – If implemented as purposed there would be ENERGY STAR Qualified fans being sold that would not meet building code requirements and thus could not be installed. – Perhaps it would be worth looking at the current CFM / Watts / Sone breakdown as they now appear in table # 1 – Rather than 76 CFM perhaps the number should be 130 CFM or the breakdown should go 1-75 CFM/ 1.5 Sone 1.4 CFM/watt , 76 – 130 CFM / 1.5 Sone 2.8 CFM/Watt , 131 and above 2.5 Sone 2.8 CFM/Watt

Regards Item C – Instructions, We understand the value of Picture diagram type instructions however we do not feel it is integral to the ENERGY STAR program.

Regards Section 4 Product Testing Item D

Regards Static Pressure – HVI Certifies & lists fans at both 0.1” SP & 0.25” static pressure. These fans can be certified for both Air & Sound at 0.25” S.P. the extra sound test takes approx 5 minutes to complete – Currently we list fans on the HVI web site and give the air & sound performance at 0.1” SP & 0.25” SP – We agree that the fan’s performance #'s should better reflect the way they are being installed. If ENERGY STAR is going to require that performance at 0.25” SP be considered we would ask that not only the Air Performance at 0.25” SP be certified but the Sound level at 0.25” S.P. as well.

Best Regards.

Carmen De Luca
Joe Kennedy

Air King Limited